

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

DECLARATION OF DEBORAH E. GREENSPAN

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pursuant to 28 U.S.C. § 1746, I, Deborah A. Greenspan, hereby declare as follows under penalty of perjury:

1. On June 15, 2021, I submitted an expert report entitled the *Report of Deborah E. Greenspan* (the “**Greenspan Expert Report**”). JX-0528 – JX-0529 is a true and accurate copy of the Greenspan Expert Report and appendices thereto. The Greenspan Expert Report addresses terms of the Plan¹ governing the resolution of individual personal injury claims asserted against the Debtors, Released Parties, and Shareholder Released Parties.

2. Since June 15, 2021, I have reviewed updates to the Plan and the Plan Supplements. The updates to the Plan and Plan Supplements do not change any of the opinions expressed in the Greenspan Expert Report. I reserve the right to revise my opinions in light of my ongoing review of materials, including data, documents, and depositions or other testimony that may subsequently come to light.

3. In accordance with my understanding of paragraph 4.h of the *Third Amended Order Granting Debtors’ Motion for Order Establishing Confirmation Schedule and Protocols* [Docket No. 3347], I respectfully submit this Declaration and the Greenspan Expert Report attached hereto as my direct testimony on behalf of the Debtors.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Debtors’ *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 3185] (the “**Plan**”) or the *Fifth Amended Disclosure Statement for the Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma, L.P., et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2983] (as may be subsequently supplemented, amended, or modified from time to time, the “**Disclosure Statement**”), as applicable.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 5, 2021

By: /s/ Deborah E. Greenspan
Deborah E. Greenspan